

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITHOUT PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions without prejudice, and terminate AMS from the docket in the actions. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Barbara R. Binis
Barbara R. Binis
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reeds.com
Attorney for Defendant American Medical Systems, Inc.

/s/ Aimee H. Wagstaff

Aimee H. Wagstaff
ANDRUS WAGSTAFF
7171 West Alaska Drive
Lakewood, CO 80226
303.376.6360 (phone)
303.376.6361 (fax)
Aimee.Wagstaff@ahw-law.com
Attorney for Plaintiffs on Exhibit A

/s/ William J. Doyle II

William J. Doyle, II
DOYLE LOWTHER
Suite 150
10200 Willow Creek Road
San Diego, CA 92131
858.935.9960 (phone)
858.939.1939 (fax)
bill@doylelowther.com
Attorney for Plaintiffs on Exhibit B

/s/ Jeffrey S. Glassman

Jeffrey S. Glassman
THE LAW OFFICES OF JEFFREY S.
GLASSMAN
Suite 3333
One Beacon Street
Boston, MA 02108
617.367.2900 (phone)
617.720.9999 (fax)
jeff@jeffreysglassman.com
Attorney for Plaintiffs on Exhibit C

/s/ Fidelma L. Fitzpatrick

Fidelma L. Fitzpatrick
MOTLEY RICE
Suite 200
321 South Main Street
Providence, RI 02903
401.457.7700 (phone)
401.457.7708 (fax)
ffitzpatrick@motleyrice.com
Attorney for Plaintiffs on Exhibit D

/s/ Jayne Conroy

Jayne Conroy
SIMMONS HANLY CONROY
112 Madison Avenue
New York, NY 10016-7416
212.784.6400 (phone)
212.213.5949 (fax)
jconroy@simmonsfirm.com
Attorney for Plaintiffs on Exhibit E

/s/ Kyla Cole

Kyla Cole
WATERS & KRAUS
3219 McKinney Avenue
Dallas, TX 75204
214.357.6244 (phone)
214.357.7252 (fax)
kcole@waterskraus.com
Attorney for Plaintiffs on Exhibit F

EXHIBIT A - ANDRUS WAGSTAFF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-01485	Kathleen Tooman v. Ethicon, Inc.,American Medical Systems, Inc., Johnson & Johnson

EXHIBIT B - DOYLE LOWTHER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-27950	Wanda Floyd v. Ethicon, Inc.,American Medical Systems, Inc., Johnson & Johnson

EXHIBIT C - THE LAW OFFICES OF JEFFREY S. GLASSMAN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-20897	Marilyn Goodspeed v. Ethicon, Inc.,American Medical Systems, Inc., Johnson & Johnson

EXHIBIT D - MOTLEY RICE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-27707	Patricia Ruggiero v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson

EXHIBIT E - SIMMONS HANLY CONROY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-06017	Mary Mathis v. Ethicon, Inc.,American Medical Systems, Inc., Johnson & Johnson

EXHIBIT F - WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-24010	Constance R. Garrett v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis